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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT HUNTER BIDEN,

Plaintiff,

vs.

PATRICK M. BYRNE

Defendants.

) Case No.: 2:23-CV-09430-SVW-PD
) Judge: Honorable Stephen V. Wilson
) Courtroom "10A"

DECLARATION OF PATRICK BYRNE

23 I, Patrick Byrne, declares as follows:

24 1. I have terminated Michael Murphy as my attorney. There has been a breakdown
25 in the attorney-client relationship with Mr. Murphy.

26 2. Numerous critical errors were caught by my attorney, Stefanie Lambert, upon her
27 arrival in Los Angeles for trial. Ms. Lambert has been my attorney for several years and has been
28 intimately involved consulting in this case and related matters.

1 3. Specifically, Mr. Murphy was not ready for trial, and had not even obtained my
2 entire video deposition to play for the jury. Mr. Murphy had repeatedly represented to me that
3 my video deposition could be played for the jury in the event I was not able to testify in person.

4 4. It was Mr. Murphy that told me on July 23, 2025, that I did not need to appear for
5 trial and that the other side would not be prejudice if I notified that I did not intend to appear.

6 5. On July 23, 2025, Mr. Murphy promised me that he could use my video
7 deposition at trial.

8 6. On July 28, 2025, Ms. Lambert discovered that Mr. Murphy did not have my
9 video depositions which making it impossible for me to present it to the jury.

10 7. On July 29, 2025, wrote an email stating that he never requested the video
11 depositions in order to “save me money.”

12 8. On July 29, 2025, Ms. Lambert directed my deposition videos be produced by
13 Veritext, and was informed that one of the three deposition videos had been sent to Mr. Murphy
14 in January, but he could not find it.

15 9. This is not the only example of Mr. Murphy being ill-prepared to try my case.

16 10. Mr. Murphy arranged a deal to pay Hunter Biden’s attorneys to print the exhibits,
17 yet none of my exhibits made it into the “joint” exhibit binder. I never consented to pay Biden’s
18 attorneys to prepare any of my work product for trial.

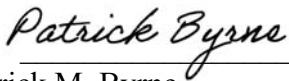
19 11. To make matters worse, Mr. Murphy did not file the word version of the witness
20 list or exhibit list as required by the Court. Mr. Murphy copied Hunter Biden’s word version and
21 sent it to Ms. Lambert to file containing false information as to Mr. Moynihan’s testimony. This
22 would have been malpractice to read to a jury.

23 12. The Complaint that was filed in this case involves allegations related to Iran. An
24 associate for Mr. Murphy was observed by Ms. Lambert to be wearing tennis shoes and a
25 Palestinian flag pin on her suit jacket at the federal court hearing for my case. I have no faith in
26 Mr. Murphy or his law firm at this point.

27 13. Ms. Lambert is an expert in this case, and is prepared to try this case. I do not
28 want to move the trial date and I wish for her to begin trial with attorneys Mr. Neff, and Mr. Yu

1 this week. Mr. Ticktin is not available because he is in trial, and his schedule is full for months to
2 come. Without Ms. Lambert, I do not consent Mr. Neff or Mr. Yu to represent me. Ms. Lambert
3 has unique institutional knowledge that is irreplaceable.

4 14. Ms. Lambert represents numerous defendants in federal criminal matters, and the
5 I declare under penalty of perjury under the laws of the United States of American that the
6 foregoing is true and correct.

7
8 
9 Patrick M. Byrne

10 Date: July 30, 2025

LAW OFFICES OF MICHAEL C. MURPHY
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